

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

ALAMEDA COUNTY EMPLOYEES')	
RETIREMENT ASSOCIATION,)	
Plaintiff,)	Case No.: 4:12-CV-1256
)	
v.)	
)	
BP p.l.c., BP AMERICA INC., BP)	
EXPLORATION & PRODUCTION INC.,)	
ANTHONY B. HAYWARD and DOUG)	
SUTTLES,)	
)	
Defendants.)	
)	
In re BP p.l.c. Securities Litigation)	MDL No. 2185
)	
)	Hon. Keith P. Ellison

STIPULATION AND ORDER

WHEREAS, on April 20, 2012, Plaintiff Alameda County Employees' Retirement Association commenced the above-captioned action in this Court;

WHEREAS, on May 1, 2012, Plaintiff filed a Corrected Complaint in this action;

WHEREAS, the parties have conferred and agreed upon a schedule for Plaintiff to file an amended complaint and for Defendants to answer, move to dismiss or otherwise respond to that amended complaint;

WHEREAS, there are no pending dates set by the Court that would be affected this extension;

THEREFORE, IT IS STIPULATED AND AGREED by and between the undersigned parties:

1. The undersigned counsel for Defendants agree to accept service of the Corrected Complaint on behalf of Defendants, without waiving any defenses other than failure of service of process, and specifically preserving the defense of lack of personal jurisdiction.

2. Plaintiff agrees that Defendants need not respond to the Corrected Complaint.

3. Plaintiff shall have 90 days from the entry date of this Stipulation and Order in which to file an amended complaint.

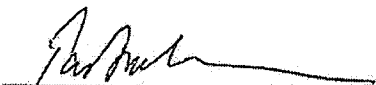
4. Plaintiff further agrees that Defendants shall have 60 days from the filing of the amended complaint in this action to answer, move to dismiss or otherwise respond to that amended complaint. If Defendants move to dismiss the amended complaint, Plaintiff's opposition to that motion shall be due within 60 days of the filing of the motion and Defendants' reply in further support of their motion shall be due within 40 days of the filing of Plaintiff's opposition.

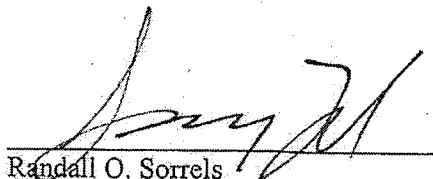
5. BP p.l.c., BP America Inc. and BP Exploration & Production Inc. will make available to Plaintiff all documents and other discovery produced by any BP entity in *In re Oil Spill by the Oil Rig "Deepwater Horizon" in the Gulf of Mexico, on April 20, 2010*, MDL 2179 (E.D. La.) ("MDL 2179"), and will not object to Plaintiff gaining access to all documents and discovery produced by other parties in MDL 2179, on substantially the same terms as governs the use of those documents by plaintiffs in MDL 2179.

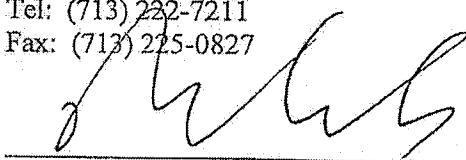
6. Plaintiff may attend and shall have an opportunity to examine deponents in all depositions of any witness taking place in MDL 2179, so long as Plaintiff has access to all discovery produced by any BP entity in MDL 2179.

STIPULATED AND AGREED:

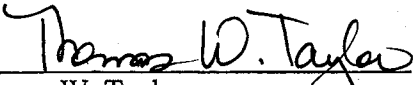
Dated: May 14, 2012

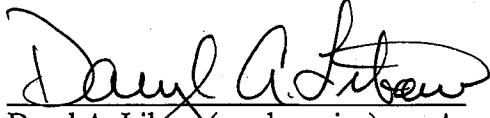

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IT IS SO ORDERED.

Signed: May __, 2012

HON. KEITH P. ELLISON
UNITED STATES DISTRICT JUDGE